## STEPHEN D. HANS ASSOCIATES, P.C. LABOR & EMPLOYMENT COUNSEL FOR OVER 40 YEARS

30-30 Northern Blvd, Suite 401 Long Island City, NY 11101

T: 718.275.6700 • F: 718.275.6704

NILS C. SHILLITO
ASSOCIATE
Tel: 718.275.6700
nshillito@hansassociates.com

VIA ECF

August 2, 2021

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:\_
DATE FILED: \_\_8/2/2021

Hon. Robert W. Lehrburger United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Hilaire, et al. v. Underwest Westside Operating Corp., et al.

Case No. 19-CV-3169 (PAE)(RWL)

Dear Judge Lehrburger:

This firm represents the defendants in the above-referenced matter. I write jointly with the consent of counsel for the plaintiffs to respectfully request one final extension of time until August August 9, 2021 for the parties to file a joint motion for preliminary approval of their anticipated class-wide settlement agreement. This is the parties' fifth and final request for such an extension of time. When the parties first notified the Court on April 30, 2021 that they had reached a settlement in principle following extensive mediation efforts, the Court set a deadline of June 5<sup>th</sup> for the parties to file such motion. The Court subsequently extended this deadline to June 28<sup>th</sup>, July 13<sup>th</sup>, July 22<sup>nd</sup>, and August 2<sup>nd</sup>, respectively, based upon the parties' prior requests.

The reason for this request is that the parties encountered many challenges coordinating the settlement of this action with the settlement of a related case in the District of New Jersey, entitled Sawadogo, et al. v. Zap Lube & Car Wash, Inc., et al., Case No.: 20-CV-01196. These efforts to coordinate the settlement of both cases simultaneously created some additional delays in finalizing both settlements, however most of these issues have since been resolved. The parties are now able to state with certainty that they shall not request any further extension of time beyond that sought herein. The parties thank the Court once again for providing them with the time necessary to complete these complex and difficult negotiations.

Respectfully Submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: Arenson, Dittmar & Karban (via ecf)

SO ORDERED:

8/2/2021

HON, ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE